

Fraser'side IP, LLC,
Plaintiff,

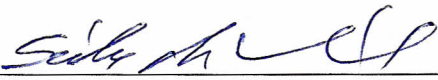
Netvertising Ltd, d/b/a HardXXXXTube.com,
WhoIsGuard, d/b/a HardXXXXTube.com,
Richard Szeles and Laslo Racz, John Does
1-100 and John Doe Companies 1-100,
Defendants.

10. Neither I, nor Netvertising has ever advertised in Iowa.
11. Neither I, nor Netvertising has ever maintained servers in Iowa.
12. Neither I, nor Netvertising has ever paid taxes in Iowa.
13. I have never visited Iowa.
14. Netvertising does not "aim" or "direct" its websites at Iowa any more than it "aims" or "directs" its websites towards any location in the free world where the internet is available.
15. Neither I, nor Netvertising is located in the United States.
16. Neither I, nor Netvertising have ever had a telephone number in the United States.
17. Neither I, nor Netvertising has ever had an office in the United States.
18. Neither I, nor Netvertising, has ever had employees in the United States.
19. Neither I, nor Netvertising, has ever had an agent for service of process in the United States.
20. Neither I, nor Netvertising has ever advertised in the United States.
21. Neither I, nor Netvertising has ever maintained servers in the United States.
22. Neither I, nor Netvertising has ever paid taxes in the United States.
23. I have only visited the United States once, for a period of one week. The purpose of this trip was for a personal holiday, not to conduct Netvertising business.
24. Netvertising does not itself enter into commercial transactions with users located in Iowa, the United States, or anywhere else in the world. Although there is a link in the HardXXXTube.com website for a so-called "premium membership," clicking on that link brings the user to a "white label" site operated by a third party. Netvertising does not own or control the white label site. Instead, Netvertising entered into an agreement with a third-party content



provider that hosts and runs the "premium membership" site. The third-party provider not only runs the premium site and provides all of the content, it also exclusively handles all billing for the site. Netvertising is paid a referral fee by the third-party provider when individuals sign up for an account. To the best of my knowledge, this is how most adult "tube" websites operate.

Signed under the pains and penalties of perjury this 11th day of April, 2012.


Richard Szeles